

May 13, 2015

BY ELECTRONIC POSTING

Ms. Marlene H. Dortch Secretary
Federal Communications Commission 445
12th Street, SW
Washington, DC 20554

Subject: Planet Labs Inc. Notice of Launch and Operation of Satellite System
Authorization to Launch and Operate a Remote-Sensing Satellite System File
No. SAT-MOD-20140321-00032, Call Sign S2912

Dear Ms. Dortch:

Planet Labs Inc. (“Planet Labs”), pursuant to Section 25.164 of the Commission’s Rules, hereby notifies the Commission that it has met the fifth and final milestone set forth in the authorization released on June 18, 2014.¹ In the *Planet Labs Mod*, the Commission granted Planet Labs authority to construct, launch, and operate a non-geostationary-orbit (“NGSO”) satellite system consisting of an additional thirty nine (39) Earth Exploration Satellite Service (“EESS”) spacecraft that are physically and technically identical to those previously authorized under Call Sign S2912.² Twenty eight (28) of the additional satellites (“Flock 1b”) are to operate in circular orbits between 380 and 410 kilometers. The other eleven additional satellites (“Flock 1c”) are to operate in circular orbit at an altitude of 620 kilometers. On September 12, 2014, the International Bureau determined that Planet Labs met the first four milestone requirements set forth in the *Planet Labs Mod*.³

In this Request, Planet Labs demonstrates that it has brought all of the authorized satellites into operation in the authorized orbits, except with respect to six (6) Flock 1b satellites which

¹ See *Planet Labs Inc.*, Stamp Grant in File No. SAT-MOD-20140321-00032 (released June 18, 2014, “*Planet Labs Mod*”).

² See *Planet Labs Inc.*, Stamp Grant in File No. SAT-LOA-20130626-00087 (released December 03, 2013, “*Planet Labs Grant*”).

³ See Public Notice, Report No. SAT-01040, DA 14-1317 (September 12, 2014).

experienced a deployment failure and were returned to Earth,⁴ and has operated the deployed satellites in accordance with the *Planet Labs Mod* authorization. As a result of these showings, Planet Labs respectfully requests that the International Bureau determine that Planet Labs has satisfied the fifth milestone requirement that was imposed in the *Planet Labs Mod*.

The determination that Planet Labs has satisfied the fifth satellite system implementation milestone will allow Planet Labs to further reduce the amount of the remaining \$1 million bond to \$0. See 47 C.F.R. § 25.165(d). Planet Labs seeks the prompt issuance by the Commission of a public notice authorizing this bond reduction.

Summary

The Bureau granted Planet Labs' NGSO EESS system application on June 18, 2014 in the *Planet Labs Mod*. Paragraph 8 of the Attachment to Grant required Planet Labs to meet five satellite implementation milestones, as follows⁵:

- Enter into a binding non-contingent contract to construct the licensed satellite system by June 18, 2015;
- Complete Critical Design Review by June 18, 2016;
- Begin construction of the first satellite by December 18, 2016;
- Launch and begin operation of the first satellite by December 18, 2017;
- Bring all of the authorized satellites into operation by June 18, 2020.

Planet Labs' progress toward implementing its authority for its additional thirty nine (39) satellite NGSO EESS system has reached the fifth milestone point contained in the *Planet Labs Mod*.

The eleven (11) Flock 1c satellites were successfully launched directly into orbit aboard a Dnepr rocket on June 19, 2014 and have since been operating in accordance with the

⁴ To the extent necessary, Planet Labs requests waiver of the bring-into-operation requirement with respect to these six (6) Flock 1b satellites.

⁵ See *Planet Labs Mod*, Attachment to Grant at 1-2.

authorization.

The twenty eight (28) Flock 1b satellites were successfully launched aboard an Antares rocket on July 13, 2014 and temporarily stowed aboard the International Space Station (ISS). The first twelve (12) Flock 1b satellites were deployed from the ISS into the intended orbit beginning on August 19, 2014. During the deployments, a defect was discovered in the deployment mechanisms, and deployments of the Flock 1b satellites from the ISS were temporarily halted.

Replacement parts for the deployment mechanisms were delivered to the ISS in January 2015, after which the deployment of the Flock 1b satellites resumed on February 27, 2015. Ten (10) additional Flock 1b satellites were deployed into their intended orbits, with the final deployment occurring on March 5, 2015. A total of twenty two (22) Flock 1b satellites successfully were brought into service.

Six (6) of the Flock 1b satellites were contained inside deployers that could not be repaired on orbit, and those 6 satellites were delivered back to Earth and returned to Planet Labs. Planet Labs has no intention of re-launching those 6 returned satellites as newer satellites with improved technologies are already in production. Planet Labs thus considers the deployment and commencement of operations of Flock 1b and Flock 1c to be complete.

Accordingly, Planet Labs is filing this notification pursuant to Sections 25.164(c), (d) and (e) of the Commission's Rules to report its completion of the fifth requirement. In addition, because satisfaction of these requirements permits it to reduce the amount of the bond filed with the Commission, it is requesting that the Commission review this submission and issue a determination that Planet Labs has met its final implementation milestone, allowing it to reduce the amount of its performance bond from \$1 million to \$0,

commensurate with the progress made to date in bringing its authorized system into service. Appropriate showings regarding the completion of the fifth milestone are shown in the attachments.

* * * * *

Should there be any questions regarding the foregoing information, please contact the undersigned representative by telephone at (415) 829-3313, or by email at mike@planet.com.

Respectfully submitted,
PLANET LABS INC.

By: s/ Michael Safyan
Michael Safyan
Director of Launch and Regulatory Affairs
Planet Labs Inc.

List of Attachments

- | | |
|--------------|--|
| Attachment A | Shipping invoice from NanoRacks regarding the return of the 6 Flock 1b satellites never to be brought into service (2/26/2015 and 3/25/2015) |
| Attachment B | Press release from NanoRacks regarding the successful deployment of the final remaining Flock 1b satellites (3/6/2015) |

Attachment A

| SHIPPING CONTAINER TALLY | | | | | | | | | | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| REQUISITION AND INVOICE/SHIPPING DOCUMENT | | | | | | | | | | | | | | | OMB No. 0704-0246 OMB approval expires Apr 30, 2009 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>The public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Department of Defense, Executive Services Directorate (0704-0246). Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.</p> <p>PLEASE DO NOT RETURN YOUR FORM TO THE ABOVE ORGANIZATION. RETURN COMPLETED FORM TO THE ADDRESS IN ITEM 2.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>1. FROM: (Include ZIP Code) NanoRacks LLC 555 Forge River Road Suite 120 Webster, TX 77598</p> | | | | | | | | | | <p>SHEET NO. 1</p> | | <p>NG. OF SHEETS 1</p> | | <p>6. REQUISITION DATE</p> | | <p>6. REQUISITION NUMBER</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>2. TO: (Include ZIP Code) Planet Labs 346 9th St San Francisco, CA 94103</p> | | | | | | | | | | <p>7. DATE MATERIAL REQUIRED (YYYYMMDD) 20150226</p> | | | | | <p>8. PRIORITY ROUTINE</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>3. SHIP TO - MARK FOR Chester Gillmore (760-902-0546) or Alexander Wen (760-902-0546)</p> | | | | | | | | | | <p>9. AUTHORITY OR PURPOSE Transfer of Responsibility to Planet Labs</p> | | | | | <p>10. SIGNATURE Conor G Brown <small>Digitally signed by Conor G Brown DN: cn=Conor G Brown, o=NanoRacks LLC, ou=Webster, st=TX, email=conor@nanoracks.com</small></p> | | | | | <p>11a. VOUCHER NUMBER & DATE (YYYYMMDD) PLFlock1BReturn20150226</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>12. DATE SHIPPED (YYYYMMDD) 20150226</p> | | | | | | | | | | <p>13. MODE OF SHIPMENT SWA Cargo - Hand Carry</p> | | | | | <p>14. BILL OF LADING NUMBER</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>15. AIR MOVEMENT DESIGNATOR OR PORT REFERENCE NO.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4. APPROPRIATIONS DATA 4 Flock-1B Planet Labs Doves returned from NanoRacks after SpaceX-5 return.</p> | | | | | | | | | | | | | | | <p>AMOUNT</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <thead> <tr> <th>ITEM NO. (a)</th> <th>FEDERAL STOCK NUMBER, DESCRIPTION, AND CODING OF MATERIEL AND/OR SERVICES (b)</th> <th>UNIT OF ISSUE (c)</th> <th>QUANTITY REQUESTED (d)</th> <th>SUPPLY ACTION (e)</th> <th>TYPE CONTAINER (f)</th> <th>CON-TAINER NOS. (g)</th> <th>UNIT PRICE (h)</th> <th>TOTAL COST (i)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Flock-1B Dove; HWID 081a</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>0.00</td> </tr> <tr> <td>2</td> <td>Flock-1B Dove; HWID 0816</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>0.00</td> </tr> <tr> <td>3</td> <td>Flock-1B Dove; HWID 080d</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>0.00</td> </tr> <tr> <td>4</td> <td>Flock-1B Dove; HWID 0810</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>0.00</td> </tr> <tr> <td colspan="8"></td> <td>0.00</td> </tr> </tbody> </table> | | | | | | | | | | ITEM NO. (a) | FEDERAL STOCK NUMBER, DESCRIPTION, AND CODING OF MATERIEL AND/OR SERVICES (b) | UNIT OF ISSUE (c) | QUANTITY REQUESTED (d) | SUPPLY ACTION (e) | TYPE CONTAINER (f) | CON-TAINER NOS. (g) | UNIT PRICE (h) | TOTAL COST (i) | 1 | Flock-1B Dove; HWID 081a | | | | | | | 0.00 | 2 | Flock-1B Dove; HWID 0816 | | | | | | | 0.00 | 3 | Flock-1B Dove; HWID 080d | | | | | | | 0.00 | 4 | Flock-1B Dove; HWID 0810 | | | | | | | 0.00 | | | | | | | | | 0.00 | | | | | | | | | | |
| ITEM NO. (a) | FEDERAL STOCK NUMBER, DESCRIPTION, AND CODING OF MATERIEL AND/OR SERVICES (b) | UNIT OF ISSUE (c) | QUANTITY REQUESTED (d) | SUPPLY ACTION (e) | TYPE CONTAINER (f) | CON-TAINER NOS. (g) | UNIT PRICE (h) | TOTAL COST (i) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Flock-1B Dove; HWID 081a | | | | | | | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Flock-1B Dove; HWID 0816 | | | | | | | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Flock-1B Dove; HWID 080d | | | | | | | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Flock-1B Dove; HWID 0810 | | | | | | | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| <p>16. TRANSPORTATION VIA AMC OR MSC CHARGEABLE TO</p> | | | | | | | | | | <p>17. SPECIAL HANDLING</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>18. ISSUED BY</p> | | | | | | | | | | <p>TOTAL CON-TAINERS</p> | | <p>TYPE CON-TAINER</p> | | <p>DESCRIPTION</p> | | <p>TOTAL WEIGHT</p> | | <p>TOTAL CUBE</p> | | <p>19. CONTAINERS RECEIVED EXCEPT AS NOTED</p> | | <p>DATE (YYYYMMDD)</p> | | <p>BY</p> | | <p>SHEET TOTAL</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| <p>TOTAL</p> | | | | | | | | | | | | | | | | | | | | | | | | <p>20. RECEIVER'S VOUCHER NO.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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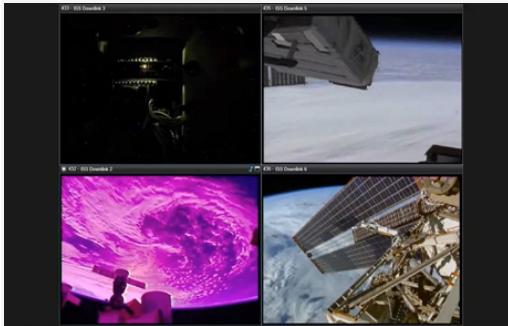
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Attachment B

NanoRacks Completes Historic Third Round of Space Station CubeSat Deployments

Houston, TX- March 6, 2015— NanoRacks, the Go-To CubeSat Deployment Company, is pleased to announce the successful completion of its third full round of CubeSat deployments from the International Space Station.

Deployed from the NanoRacks CubeSat Deployer were 16 CubeSats since the February 27, 2015 deployment window opened. Included were 12 Planet Labs Doves (10 Flock-1B, 2 Flock-1D'), Spaceflight Services & MIT's MicroMAS, San Jose University and Greece's LambdaSat, NASA Ames' TechEdSat-4, and the GEARRSat CubeSat.



"We are delighted to show once again that the International Space Station is an ideal deployment platform for satellites," said NanoRacks CEO Jeffrey Manber. "And we thank our friends at NASA and JAXA for working to make this program a reality."

The latest deployment cycle was made possible only by a historic on-orbit repair of hardware that had earlier not performed. It involved close coordination between the NanoRacks team and officials from the ISS space agencies.

Accessible at <http://nanoracks.com/historic-third-round-of-space-station-cubesat-deployments/>